

# **EXHIBIT A**

## CeCe Cole

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**From:** Mark Passin <mark@csrlawyers.com>  
**Sent:** Thursday, February 23, 2023 2:14 PM  
**To:** CeCe Cole; Zach Press  
**Cc:** Ben Tragish  
**Subject:** RE: Freeman v. Wolff

### External Email

No one ever got back to me regarding the below.

I also want to mention that the problem with using contract lawyers is that they are not familiar enough with the case to really know what should or should not have been redacted. However, I would consider using them if we put off the deposition schedule to allow us time to work with the contract lawyers and figure out all of the text messages that should not have been redacted and review them prior to the depositions.

Best regards.

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**From:** Mark Passin  
**Sent:** Wednesday, February 22, 2023 5:06 PM  
**To:** CeCe Cole <CCole@cdas.com>; Zach Press <zach.press@klarislaw.com>  
**Subject:** Freeman v. Wolff

CeCe and Zach,

I intend to make a motion regarding the redactions you made to the texts.

I want to show the court some examples. Do you have any objection to our filing under seal with the motion typewritten examples of what we contend were improper redactions.

Best regards.

**Mark D. Passin  
Of Counsel**



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